



September 10, 2015

House Bill 4822

Summary of comments and recommendations:

The requirement for three language arts K-3 assessments during the year is positive, and will make the small number of school not already doing this fall into line with good practice.

The requirement for literacy coaches could also be a positive, but vague language will cause confusion. Are these part time or full time? What does the prohibition from doing activities that might appear to be administrative duties really mean? The bill outlines what a literacy coach could do, but nothing in the bill ensures that skilled coaches will deliver high-quality services. With the present language you could easily get just more of the same non-optimal systems that already exist in most schools.

The requirement for literacy coaches (full or part time?) does not consider the number of students in each school. Does a school of 900 students have one coach, and also a school of 150 students?

An emphasis on high-quality instruction in the regular classroom is not clearly detailed in the bill. Class size is not referenced. Teacher skills for literacy are not specifically stated. A detailed framework for monitoring student growth in literacy is not implied or stated.

For better outcomes, it is imperative that students get quality instruction and intervention if needed as soon as possible, preferably in Kindergarten. Data tracking systems starting in Kindergarten, carefully monitoring student progress through the sequence of essential early literacy skills, are not required by this bill. Summer camps for K, 1, 2 are far more important than anything provided to children after grade 3, by which time interventions are less effective. Waiting until after grade 3 for offering these extra services is not effective.

There is no suggestion in the bill of the importance of developing the whole child during these early childhood years, including oral language, sensory-motor, and self-regulation skills which directly impact literacy outcomes. Systematic data tracking in these areas would also allow teacher to offer interventions more quickly and effectively.

The lack of clear standards defining when a student exhibits a deficiency in reading is a major problem in the bill. Letting schools define which students qualify as exhibiting a deficiency on

their own, without clear guidelines, will create inconsistent systems of response and allow most systems to just keep doing what they are doing.

Major Recommendations:

Maintain the requirement to use a standardized literacy assessment system 3 times per year in K-3.

Clarify the requirement for literacy coaches, defining 1 full time coach per ____ students in K-3.

Require the use of data tracking systems for all students starting in Kindergarten, carefully monitoring student progress through the sequence of essential early literacy skills. An example is provided. By using weekly updates on the development of a small set of crucial skills, the data provides information that guides instructional planning. **Only then do we have formative assessment.**

Consider expanding the data tracking requirement to include other domains of early learning (language, sensory-motor, and self-regulation) which directly impact literacy.

More clearly define which students qualify for interventions by showing a deficiency in reading, especially in the earlier grades.

Emphasize the importance of interventions as soon as possible, with quality interventions and summer camps available in K, 1, 2.

If I can help your staff write revisions to the bill to support these recommendations, I will gladly do so.

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